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December 8, 2023

BY ECF AND EMAIL

The Honorable Katherine Polk Failla  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

***Re: In re Tether and Bitfinex Crypto Asset Litigation, No. 19 Civ. 9236 (S.D.N.Y.)***

Dear Judge Failla:

We write on behalf of the B/T Defendants to seek permission to file under seal the B/T Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Leave to Amend, along with the accompanying Declaration and Exhibits (collectively, the "Opposition").

The B/T Defendants' Opposition discusses the Anonymous Trader and his trading strategy in detail, and includes references to the Anonymous Trader's deposition and quotations from his declaration dated September 5, 2020, which was previously filed under seal at Dkt. No. 190. The Opposition also cites extensively from Plaintiffs' Motion for Leave to Amend and Proposed Second Amended Complaint (Dkt. Nos. 480, 480-1), which have been filed under seal. Consistent with the Court's prior Orders regarding the Anonymous Trader's confidentiality (Dkt. Nos. 195, 215, 420, 439), the B/T Defendants intend to confer with the Anonymous Trader regarding redactions to the Opposition and to file a public version promptly thereafter.

Respectfully submitted,

/s/ Elliot Greenfield

Application GRANTED. The Clerk of Court is directed to maintain docket entries 505 and 506 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket number 504.

SO ORDERED.

Dated: December 18, 2023  
New York, New York

A handwritten signature in blue ink that reads "Katherine Polk Failla".